

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ORLANDO VALERIO,

Plaintiff,

v.

K.A.M. FOOD STORE, INC.,
d/b/a Met Foods,
MAHMOUD HASSAN DOLAH, an individual,
KHALID DOLAH, an individual,
AMIN DOLAH, an individual,

Defendants.

Case No. 1:19-cv-00593-MKB-LB

NOTICE OF MOTION FOR DEFAULT

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Plaintiffs' Motion for Default Judgment and Damages dated June 18th, 2019, the Declarations of Penn A. Dodson, Esq. and Plaintiff Orlando Valerio, and all exhibits annexed thereto, as well as the and upon all other pleadings and proceedings heretofore had herein, that Plaintiff Orlando Valerio will move this Court on _____ in Courtroom _____ of the federal courthouse located at _____ for an Order pursuant to Federal Rule of Civil Procedure 55(b)(2) for the entry of a default judgment against Defendants K.A.M. Food Store, Inc., Mahmoud Hassan Dolah, an individual, Khalid Dolah, an individual, and Amin Dolah, an individual, (collectively as "Defendants"), and awarding the following damages:

- (1) actual damages under the NYLL and FLSA in the amount of \$12,431.25, consisting of the following components:

Overtime.....	\$17,232.53
Liquidated Damages (Overtime).....	\$17,232.53
Minimum Wage Shortfall.....	\$4,942.64
Liquidated Damages (Minimum Wage Shortfall).....	\$4,942.64
Wage Notice.....	\$5,000.00
Paystubs.....	\$5,000.00
TOTAL.....	\$54,350.34

- (2) liquidated damages under the FLSA and NYLL in the amount of \$54,350.34;
- (3) pre-judgment interest under the NYLL;
- (4) post-judgment interest on all monies due at a daily rate to be determined by the Clerk of the Court until the Defendants comply with the judgment;
- (5) reasonable attorney fees and costs, to be later decided, and
- (6) any such other and further relief as the Court deems proper.

Respectfully submitted, this **18th** day of **June, 2019**.

ANDERSONDODSON, P.C.



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